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February 9, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Mtume v. Sony Music Entertainment (Case No.: 1:20-cv-08648-ER)*

Dear Judge Ramos:

We represent Plaintiff, Greg McBowman, executor of the Estate of James Mtume. We write on behalf of both parties to request a stay of this lawsuit through August 31, 2023. The parties have been engaged in ongoing good faith global settlement discussions to resolve all pending litigation between them, including issues pertaining to an ongoing audit of Sony's accounting records (outside of the litigation). Mr. Mtume initiated this audit in May 2021 to verify the accuracy of royalty statements previously issued to him and royalty payments made thereunder pursuant to the 1977 Agreement at issue in this lawsuit.

Plaintiff anticipates that, with Sony's continued cooperation, the audit will be substantially completed by the end of August 2023. Completion of the audit is necessary so that Plaintiff can evaluate any pending settlement proposals. Given that the audit is expected to be completed within the next six months, Plaintiff believes that a brief stay would allow the parties to direct their time and resources toward productive settlement efforts and avoid the need to expend additional time and resources on discovery and other pre-trial matters.

This joint request for a stay through August 31, 2023 is made in good faith and not for purposes of delay.

Respectfully submitted,

David Rosenberg

David B. Rosenberg

The request is granted. The Case Management Conference scheduled for April 26, 2023 at 3:30 PM is adjourned. The parties are directed to appear for a Status Conference on September 8, 2023, at 11 AM. The parties are directed to dial (877) 411-9748 and enter access code 3029857#. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", is written over a horizontal line.

Edgardo Ramos, U.S.D.J.
Dated: **February 9, 2023**
New York, New York